

AGNEW & MORRIS

Honorable Philip M. Halpern
The Hon. Charles Brieant Jr. Federal
Building and U.S. Courthouse
300 Quarropas Street, Courtroom 520
White Plains, NY 10601

VIA ECF

Re: *Crichlow v. Sipple, et al.*, 18-cv-3222

Dear Judge Halpern:

Our office represents the Plaintiff in this matter. I write to respectfully request an additional twenty-one days extension to file the parties' settlement papers. Today, I filed a motion requesting an Order creating a Supplemental Needs Trust for the benefit of the Plaintiff. Earlier today, DOCCS signed off on some last issues in our proposed Settlement Stipulation, which you will find attached to the motion papers. The parties did have to negotiate some issues specific to Mr. Crichlow given his other pending suit and creation of the Trust.

Once the Court orders the Trust, we will then send the Trust papers, along with the Settlement Stipulation, and the required Medicare Affidavit to our client at Wyoming Correctional Facility. We will send the documents priority with a pre-paid priority envelope back, but sometimes these things can get hung up in prison mail. I anticipate being able to file the fully executed Stipulation by August 30, 2024.

With our thanks for the Court's continuing courtesies.

Very truly yours,

/s/ **AJ Agnew**

Amy Jane Agnew, Esq.

Application granted. The time for the parties to move to reopen this case is extended to September 2, 2024.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
August 12, 2024